



SCOTT A. THOMPSON
Executive Director

OKLAHOMA DEPARTMENT OF ENVIRONMENTAL QUALITY

KEVIN STITT
Governor

January 31, 2022

David Hennessy
Panhandle Eastern Pipeline Co.
8111 Westchester Dr., Ste. 600
Dallas, TX 75225

Subject: Additional clarifications on Panhandle Eastern's Cashion Compressor Station 4-factor analysis on control scenarios under the Clean Air Act Regional Haze Program

Dear Mr. Hennessy:

In a letter dated July 1, 2020, the Oklahoma Department of Environmental Quality (DEQ) identified the Cashion Compressor Station located in Kingfisher County, Oklahoma, as subject to a four-factor reasonable progress analysis under the Regional Haze Rule as part of DEQ's development process for the state implementation plan covering the second planning period (Round 2) of 2021 – 2028.

On September 2, 2020, Panhandle Eastern submitted its report to DEQ. Panhandle Eastern included in its response that there were no cost-effective nitrogen oxides (NO_x) control measures available for U-338, U-339, U-2301, or U-2302. DEQ included these conclusions in its draft Regional Haze SIP for Planning Period 2 that was shared with the Federal Land Managers and the U.S. Environmental Protection Agency (EPA) for their review and comment. DEQ requests that Panhandle Eastern review its four-factor analysis for potential NO_x control measures and respond to the following information request, which is based on EPA's review of Oklahoma's draft SIP. We understand that some of the requested data/analysis may be gleaned or explained from DEQ's permitting and compliance files. However, your response will allow Panhandle Eastern to document the information that best explains and supports the conclusions of your four-factor analysis. DEQ intends to continue its analysis in parallel.

The company should provide additional discussion of how the engine testing was conducted to determine the actual NO_x emissions from the four engines and, if available, provide the testing report or other documentation of the engine testing.

DEQ respectfully requests that Panhandle Eastern respond to this information request no later than February 28, 2022. Thank you for your assistance with this matter. Please contact Melanie Foster at 405-702-4218 for any questions or clarification.

Sincerely,

A handwritten signature in black ink, appearing to read 'Kendal Stegmann', is written over a light blue circular watermark of the Oklahoma State Seal.

Kendal Stegmann
Director, Air Quality Division

